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June 25, 2021

VIA ECF

The Honorable Rachel P. Kovner
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 4E-N
Brooklyn, New York 11201

Re: *Palmer v. The City of New York, et al.*
Case No.: 19-5542
FKB File No.: 303.021

Dear Judge Kovner:

We represent defendant Stephen S. Weintraub, Esq. ("Attorney Weintraub") in the above-referenced action.

We write to respectfully request clarification on Your Honor's Individual Practice Rule IV(A) regarding Pre-Motion Conferences. While Rule IV(A) does not specifically state pre-motion conference requests are necessary before filing a motion pursuant to Fed. R. Civ. P. 11, we seek to confirm a pre-motion conferences request is not necessary prior to filing such motion.

Kindly contact the undersigned to clarify whether the Court requires a pre-motion conference request prior to filing a motion pursuant to Fed. R. Civ. P. 11. Thank you for your courtesies and consideration.

Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

/s/ Samantha Panny

Samantha Panny

Rachel Aghassi

cc: All counsel of record (via ECF)